

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

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JUN 27 2014

U. S. DISTRICT COURT
MID. DIST. TENN.

ROBERT ZENAS WHIPPLE, III

Plaintiff,

v.

DERRICK SCHOFIELD, et al.

Defendants.

CASE NO. 1:13-cv-00109

CHIEF JUDGE HAYNES

JURY DEMAND

Quarrell
Termination
is DENIED for
lack of proof
and
pretext

PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER
TO STOP RETALIATION

Comes now the plaintiff and moves for an order preventing Debra Johnson from *inappropriate*
retaliation against the Plaintiff. Specifically, Plaintiff prays that Debra Johnson be ORDERED *penalties*
to:

- refrain from engaging in any conduct that is calculated to lead to the "Serving with *Will*
Canines" program being discontinued;
- not have the plaintiff moved to Unit 3, Unit 4, and/or another prison;
- restore plaintiff to his previous program assignment as an animal trainer; and
- cease all forms of retaliation for engaging in protected conduct.

As grounds for this motion, plaintiff avers:

1. On May 30, 2014, Plaintiff was threatened with retaliation by Ms. Johnson for engaging in protected conduct (*see* ¶ 2, Exhibit A, *Declaration in Support...*).
2. Plaintiff dismissed Ms. Johnson with the express intent of avoiding retaliation (*Id.* ¶ 4).